

OneWeb  
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February 15, 2018

**VIA ELECTRONIC DELIVERY**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

**Re: Notice of Ex Parte Presentation in IB Docket No. 16-408; GN Docket No. 17-183;  
IBFS File No. SAT-AMD-20180104-00004**

Dear Ms. Dortch:

On February 13, 14 and 15, 2018, Michael Lindsay (Principal, Advanced Mission Design) and the undersigned of WorldVu Satellites Limited (“OneWeb”) and David Carmen (President and CEO of the Carmen Group), advisor to OneWeb, met separately with legal advisors to Chairman Pai, Commissioner O’Rielly, Commissioner Carr, Commissioner Rosenworcel, and Commissioner Clyburn.<sup>1</sup> The parties discussed OneWeb’s positions of record in the above-referenced proceedings.<sup>2</sup>

Among other things, OneWeb emphasized that the following considerations are critical to the successful development of NGSO FSS systems:

- Band segmentation should not guide spectrum sharing in the United States when coordination in good faith is not achievable.<sup>3</sup>

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<sup>1</sup> See Annex 1 for a list of participants and the dates of each meeting.

<sup>2</sup> See Petition for Reconsideration of WorldVu Satellites Limited, IB Docket No. 16-408 (filed Jan. 17, 2018) (“NGSO Petition for Reconsideration”); Reply Comments of WorldVu Satellites Limited, GN Docket No. 17-183 (filed Nov. 15, 2017) (“OneWeb Reply Comments”); and *In re WorldVu Satellites Limited Amendment to Petition for Declaratory Ruling Granting Access to the U.S. Market for the OneWeb V-Band System*, IBFS File No. SAT-AMD-20180104-00004 (filed Jan. 4, 2018) (the “MEO Amendment”).

<sup>3</sup> See generally NGSO Petition for Reconsideration.

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- The Commission’s recent drastic change to NGSO system deployment milestones during ongoing processing rounds is the key factor that led to OneWeb’s requested MEO Amendment.<sup>4</sup>
  - Utilization of the 12.2-12.7 GHz band on a protected basis is essential for OneWeb to make its mission—to bridge the digital divide and bring affordable access to everyone—a reality.<sup>5</sup> This band should not be considered for wireless broadband use in any forthcoming rulemaking proceedings.
  - The orbital environment is extremely fragile, and even a single collision can have serious and long-lasting consequences.<sup>6</sup> Regulators should encourage responsible and reliable satellite design and operation from launch to disposal.

Very truly yours,

*/s/ Mariah D. Shuman*

Mariah D. Shuman  
Senior Director of Regulatory Affairs

cc: Erin McGrath  
David Grossman  
Will Adams  
Umair Javed  
Rachael Bender

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<sup>4</sup> See MEO Amendment at 4.

<sup>5</sup> See OneWeb Reply Comments.

<sup>6</sup> See e.g., University of Southampton, *Biggest ever space debris study highlights risks posed by satellite ‘mega-constellations’* (Apr. 19, 2017), available at <https://www.southampton.ac.uk/news/2017/04/space-debris-mega-constellations.page>.

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**Annex 1**

<b>Meeting Date</b>	<b>OneWeb Representatives</b>	<b>FCC Participant</b>
February 13, 2018	Mariah Shuman David Carmen	Erin McGrath
February 14, 2018	Mariah Shuman Michael Lindsay David Carmen	David Grossman
February 15, 2018	Mariah Shuman Michael Lindsay	Will Adams
February 15, 2018	Mariah Shuman Michael Lindsay	Umair Javed
February 15, 2018	Mariah Shuman Michael Lindsay	Rachael Bender